

Lexi J. Hazam (SBN 224457)  
*lhazam@lchb.com*  
LIEFF CABRASER HEIMANN  
& BERNSTEIN, LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111-3339  
Telephone: (415) 956-1000

Previn Warren (*pro hac vice*)  
*pwarren@motleyrice.com*  
MOTLEY RICE LLC  
401 9th Street NW, Suite 630  
Washington, DC 20004  
Telephone: (202) 386-9610

*Plaintiffs' Co-Lead Counsel*

Jennie Lee Anderson (SBN 203586)  
*jennie@andrusanderson.com*  
ANDRUS ANDERSON LLP  
155 Montgomery Street, Suite 900  
San Francisco, CA 94104  
Telephone: (415) 986-1400

*Plaintiffs' Liaison Counsel*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

*S.P., filed on behalf of minor A.P. v. Meta  
Platforms, Inc., et al., 4:24-cv-01817*

*S.L. on behalf of K.A. v. Snap, Inc., et al.,  
4:24-cv-01868*

*S.G. individually and on behalf of C.G. v.  
YouTube, LLC, et al., 4:24-cv-01843*

**ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL EXHIBITS TO THE  
DECLARATION OF JENNIE LEE  
ANDERSON IN SUPPORT OF PLAINTIFFS'  
NINTH CONSOLIDATED *EX PARTE*  
APPLICATION FOR APPOINTMENT OF  
GUARDIANS *AD LITEM***

Pursuant to Civil Local Rules 7-11 and 79-5(c), Plaintiffs respectfully move for administrative relief to file under seal the individual *Ex Parte* Applications for Appointment of Guardians *Ad Litem* (“Applications”) described in Plaintiffs’ Ninth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“*Ex Parte* Application”) and attached as Exhibits 1-3 to the Declaration of Jennie Lee Anderson in Support of Plaintiffs’ Ninth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“Anderson Declaration”).

The Applications for which sealing is sought are:

- *S.P., filed on behalf of minor A.P. v. Meta Platforms, Inc., et al.*, 4:24-cv-01817 (Exhibit 1);
- *S.L. on behalf of K.A. v. Snap Inc., et al.*, 4:24-cv-01868 (Exhibit 2); and
- *S.G. individually and on behalf of C.G. v. YouTube, LLC, et al.*, 4:24-cv-01843 (Exhibit 3).

This motion is accompanied by a [Proposed] Order and the Declaration of Jennie Lee Anderson in Support of Plaintiffs’ Administrative Motion to File Under Seal Exhibits to the Declaration of Jennie Lee Anderson in Support of Plaintiffs’ Ninth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“Anderson Decl. ISO Admin Motion”), pursuant to Civil Local Rules 7-11 and 7-12. *See* Civ. L. R. 79-5(c).

This Court previously considered and finding good cause granted Plaintiffs’ request to seal applications for guardian *ad litem* in this case. ECF No. 16.

Pursuant to Civil Local Rule 7-11, Liaison Counsel for Plaintiffs asked Defendants for a standing stipulation that Applications may be filed under seal. Liaison Counsel for Defendants confirmed that Defendants will so stipulate, but do not waive, and expressly reserve, their right to seek an order or orders in the future to unseal individual applications and/or require parents who wish to proceed pseudonymously going forward make a showing of good cause. Anderson Decl. ISO Admin. Mot. to Seal, ¶5.

For the reasons set forth above, Plaintiffs respectfully request that the Court enter the [Proposed] Order Granting Plaintiffs’ Administrative Motion to File Under Seal Exhibits in

Support of Plaintiffs' Ninth *Ex Parte* Application for Appointment of Guardians *Ad Litem*.

Dated: May 10, 2024

Respectfully submitted,

**ANDRUS ANDERSON LLP**

/s/ Jennie Lee Anderson

Jennie Lee Anderson (SBN 203586)

jennie@andrusanderson.com

**ANDRUS ANDERSON LLP**

155 Montgomery Street, Suite 900

San Francisco, CA 94104

Telephone: (415) 986-1400

***Plaintiffs' Liaison Counsel***

Lexi J. Hazam (SBN 224457)

lhazam@lchb.com

**LIEFF CABRASER HEIMANN  
& BERNSTEIN, LLP**

275 Battery Street, 29th Floor

San Francisco, CA 94111-3339

Telephone: (415) 956-1000

Facsimile: (415) 956-100

Previn Warren (pro hac vice)

pwarren@motleyrice.com

**MOTLEY RICE LLC**

401 9th Street NW, Suite 630

Washington, DC 20004

Telephone: (202) 386-9610

Facsimile: (202) 232-5513

***Plaintiffs' Co-Lead Counsel***

Christopher A. Seeger (pro hac vice)

cseeger@seegerweiss.com

**SEEGER WEISS, LLP**

55 Challenger Road, 6th Floor

Ridgefield Park, NJ 07660

Telephone: (973) 639-9100

Facsimile: (973) 679-8656

***Counsel to the Co-Lead Counsel and Settlement  
Counsel***

Joseph G. Vanzandt

**BEASLEY ALLEN CROW METHVIN**

**PORTIS & MILES, P.C.**

234 Commerce Street

Montgomery, AL 36103

Telephone: 334-269-2343

[joseph.vanzandt@beasleyallen.com](mailto:joseph.vanzandt@beasleyallen.com)

Emily C. Jeffcott  
**MORGAN & MORGAN**  
220 W. Garden Street, 9th Floor  
Pensacola, FL 32502  
Telephone: 850-316-9100  
[cjeffcott@forthepeople.com](mailto:cjeffcott@forthepeople.com)

***Federal/State Liaisons***

Matthew Bergman  
**SOCIAL MEDIA VICTIMS LAW CENTER**  
821 Second Avenue, Suite 2100  
Seattle, WA 98104  
Telephone: 206-741-4862  
[matt@socialmediavictims.org](mailto:matt@socialmediavictims.org)

Jayne Conroy  
**SIMMONS HANLY CONROY, LLC**  
112 Madison Ave, 7th Floor  
New York, NY 10016  
Telephone: 917-882-5522  
[jconroy@simmonsfirm.com](mailto:jconroy@simmonsfirm.com)

Andre Mura  
**GIBBS LAW GROUP, LLP**  
1111 Broadway, Suite 2100  
Oakland, CA 94607  
Telephone: 510-350-9717  
[amm@classlawgroup.com](mailto:amm@classlawgroup.com)

Michael M. Weinkowitz  
**LEVIN SEDRAN & BERMAN, LLP**  
510 Walnut Street  
Suite 500  
Philadelphia, PA 19106  
Telephone: 215-592-1500  
[mweinkowitz@lfsbalw.com](mailto:mweinkowitz@lfsbalw.com)

Alexandra Walsh  
**WALSH LAW**  
1050 Connecticut Ave, NW, Suite 500  
Washington D.C. 20036  
Telephone: 202-780-3014  
[awalsh@alexwalshlaw.com](mailto:awalsh@alexwalshlaw.com)

James J. Bilsborrow  
**WEITZ & LUXENBERG, PC**  
700 Broadway  
New York, NY 10003  
Telephone: 212-558-5500  
[jbilsborrow@weitzlux.com](mailto:jbilsborrow@weitzlux.com)

***Plaintiffs' Steering Committee Leadership***

Ron Austin  
**RON AUSTIN LAW**  
400 Manhattan Blvd.  
Harvey LA, 70058  
Telephone: + 1 (504) 227-8100  
Email: [raustin@ronaustinlaw.com](mailto:raustin@ronaustinlaw.com)

Paige Boldt  
**WATTS GUERRA LLP**  
4 Dominion Drive, Bldg. 3, Suite 100  
San Antonio, TX 78257  
Telephone: 210-448-0500  
[PBoldt@WattsGuerra.com](mailto:PBoldt@WattsGuerra.com)

Carrie Goldberg  
**C.A. GOLDBERG, PLLC**  
16 Court St.  
Brooklyn, NY 11241  
Telephone: (646) 666-8908  
[carrie@cagoldberglaw.com](mailto:carrie@cagoldberglaw.com)

Sin-Tiny Mary Liu  
**AYLSTOCK WITKIN KREIS & OVERHOLTZ, PLLC**  
17 East Main Street, Suite 200  
Pensacola, FL 32502  
Telephone: 510-698-9566  
[mliu@awkolaw.com](mailto:mliu@awkolaw.com)

Emmie Paulos  
**LEVIN PAPANTONIO RAFFERTY**  
316 SOUTH BAYLEN STREET, SUITE 600  
PENSACOLA, FL 32502  
Telephone: 850-435-7107  
[epaulos@levinlaw.com](mailto:epaulos@levinlaw.com)

Roland Tellis  
**BARON & BUDD, P.C.**  
15910 Ventura Boulevard, Suite 1600  
Encino, CA 91436  
Telephone: (818) 839-2333  
[rtellis@baronbudd.com](mailto:rtellis@baronbudd.com)

Diandra "Fu" Debrosse Zimmermann  
**DICELLO LEVITT**  
505 20th St North  
Suite 1500  
Birmingham, Alabama 35203  
Telephone: 205.855.5700  
[fu@dicellolevitt.com](mailto:fu@dicellolevitt.com)

Hillary Nappi  
**HACH & ROSE LLP**  
112 Madison Avenue, 10th Floor  
New York, New York 10016  
Telephone: 212.213.8311  
[hnappi@hrsclaw.com](mailto:hnappi@hrsclaw.com)

James Marsh  
**MARSH LAW FIRM PLLC**  
31 Hudson Yards, 11th Floor  
New York, NY 10001-2170  
Telephone: 212-372-3030  
[jamesmarsh@marshlaw.com](mailto:jamesmarsh@marshlaw.com)

Ruth Rizkalla  
**CARLSON LAW FIRM**  
100 E. Central Texas Expy  
Killeen, TX 76541  
Telephone: (254) 526-5688  
[RRizkalla@carlsonattorneys.com](mailto:RRizkalla@carlsonattorneys.com)

*Plaintiffs' Steering Committee Membership*